

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

CIVIL ACTION NO. 04-10491PBS

JOEY A. SCHNOBRICH,
Plaintiff(s)

V.

NELSON, WATSON &
ASSOCIATES, LLC.;
GEORGE NELSON, II;
GEORGE NELSON, III,
GREG CERULLO and JOHN
DeMINICO.
Defendants


**MOTION FOR JUDGMENT BY DEFAULT BY THE COURT AND ASSESSMENT
OF DAMAGES HEARING PURSUANT TO FED.R.CIV.P. 55 (b)(2) AGAINST THE
DEFENDANT JOHN DEMINICO
ORAL ARGUMENT REQUESTED**

Pursuant to Fed.R.Civ.P. 55(b)(2), a Notice of Default having been issued pursuant to Fed.R.Civ.P. 55(b), the Plaintiff in the above captioned matter moves for judgment of default by the court against the Defendant John DeMinico, and requests that this honorable Court issue a judgment of damages in an amount of \$7,000.00, plus Attorney Fees in the amount of \$3,981.25¹, plus punitive damages pursuant to 18 USC §2707 (c), and costs as

¹ See Affidavit of Counsel Fees.

determined by this court. A proposed form of judgment together with an affidavit of counsel fees is filed herewith.

Plaintiff
Joey Shnobrich
By his Attorney,



Daniel P. Tarlow, Esq.
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Salem, MA 01970
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Dated: 5/21/04